

October 30, 2020

Via ECF

The Honorable Denise L. Cote United States District Court Southern District of New York 500 Pearl Street, Room1610 New York, New York 10007

Re: Encarnacion et al. v. City of New York, 16 Civ. 156 (DLC) (JCF)

Dear Judge Cote:

I write on behalf of Plaintiffs to request that the Court order the parties' agreed-upon briefing schedule for Plaintiffs' motion, filed yesterday (October 29), to enforce the so-ordered settlement agreement ("Settlement") in this matter. ECF No. 94. As explained further in Plaintiffs' motion papers, the Court ordered the Settlement on February 12, 2018, and after two extensions on consent, the Settlement is set to sunset soon, without Defendant achieving compliance with a key term. The parties have agreed to a briefing schedule on Plaintiffs' motion, as follows:

Plaintiffs' motion: filed on October 29, 2020 Defendant's response: due by December 11, 2020 Plaintiffs' reply: due by December 22, 2020

Thank you for your consideration of this request.

Respectfully submitted,

By: /s/ Niji Jain

Niji Jain Adam N. Shoop Jenn Rolnick Borchetta THE BRONX DEFENDERS 360 East 161st Street Bronx, New York 10451 Telephone: (718) 838-7878 nijij@bronxdefenders.org

Counsel for Plaintiffs

cc: All Counsel (via ECF)